

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND

R.I. Bankr. Form O.2

See, LBR 7026-1(c)

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In re: _____ :
:
Debtor : BK No.
: Chapter
:
Plaintiff : A.P. No.
v. :
:
Defendant :
-----X

DISCOVERY PLAN PURSUANT TO FED. R. CIV. P. 26(f)

Pursuant to Fed. R. Civ. P. 26(f) incorporated into bankruptcy by Fed. R. Bankr. P. 7026, the parties hereby submit their Discovery Plan in accordance with R.I. LBR 7026-1(c):

1. The parties state that all disclosures under Fed. R. Bankr. 7026(a) have been made –or- the parties agree that all disclosures under Fed. R. Bankr. P. 7026(a)(1) will be made on or before [insert date] -or- that by written stipulation in accordance with Fed. R. Bankr. P. 7026(a)(1), which was filed with the court on _____, the parties have stipulated that none of the specified disclosures will be made.
2. The parties will conduct discovery concerning the following subjects: [insert types of matters which will be subject to discovery] *See*, Fed.R. Bankr. P. 7026(f)(2).
3. The parties anticipate that discovery will be completed within _____ days and agree to a discovery closure date of [insert date].
4. The parties DO/DO NOT believe they need a deadline to join other parties or amend the pleadings as such actions are not contemplated at this time. If applicable, the deadline for joinder of parties or to amend pleadings is on or before [insert date].
5. The parties agree that the deadline to file dispositive and pre-trial motions shall be [insert date].
6. The Parties agree that a Joint Pre-trial Order shall be filed on or before [insert date] provided that no dispositive motions are filed by that date. If a dispositive motion is filed, the parties

In re: _____

AP No. _____

respectfully request the court to set a joint pre-trial order deadline in any decision or order denying dispositive relief.

7. The parties believe that referral of this matter for mediation WOULD/WOULD NOT be helpful [and, if applicable, both parties consent to such referral. Due to outstanding discovery requests, the parties ask that the referral not be made until [insert date]. It is the parties understanding that such a referral will not suspend the other deadlines in this case unless the parties make such a request by written motion].
8. The parties DO/DO NOT believe that a pre-trial conference before the Court would serve any purpose at this time.

Respectfully submitted this ____ day of _____, 2001,

Plaintiff: _____

Defendant: _____

BY: Signature and Address of Attorney
For Plaintiff:

Signature and Address of Attorney
For Defendant:

